



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

April 24, 1989

William Warren, Esq.
Cohen, Shapiro, Polisher et al
Princeton Pike Corporate Center
997 Lenox Drive - Bldg. No. 3
Lawrenceville, New Jersey 08648

Re: Scientific Chemical Processing ("SCP") Site - Carlstadt, N.J.
Administrative Order Index No. II CERCLA-50114 ("the Order")

Dear Mr. Warren:

I am writing to convey EPA's concern with regard to the inconsistent and almost mutually exclusive theories which your agents have conveyed to EPA concerning groundwater flow patterns at the SCP Site.

On Friday, April 14, 1989, EPA officials met with representatives of the Respondents to the Order for the SCP Site. A list of attendees is noted in Exhibit A.

At that meeting, EPA officials were informed for the first time that your contractor, Dames & Moore, now believes that the dominant flow route in the shallow aquifer (which is grossly contaminated and which has been the focal point of almost all of your contractors' RI/FS work over the past year and a half) is downward across the clay lens into the underlying till aquifer. In fact, the Dames & Moore geologist at the meeting indicated that 90 to 95% of the precipitation which enters the Site and which remains after evapotranspiration exits the shallow aquifer by flowing across the clay lens into the till zone. In his view, only a relatively minor component (5 to 10 %) of that precipitation exits the Site in the horizontal direction across the Site boundaries. It is also my understanding, as per my phone conversation with your associate on Monday, April 17, 1989, that this view has been or is very likely to be endorsed by the Respondents for the Site.

This new theory is obviously inconsistent with the conclusions expressed in the RI which was sent to EPA. (Exhibit B, taken from the RI, clearly indicates that groundwater in the shallow aquifer is migrating in the horizontal plane out of the Site;

004248

the narrative in the RI also supports the view this is the dominant exit route of the shallow aquifer out of the Site). It is inconsistent with the representations made by your contractors during the past year. And it is not justified by any analysis provided to EPA to date.

The assertion of this new theory seems particularly unwarranted since it is made more than three years after the Respondents entered the Order and almost a year after the Respondents were to have adequately defined groundwater flows in the RI. It is also extremely untimely, given that EPA must now assess options for remediating contamination in this shallow zone. The Respondents have, at a critical time in this project, confronted EPA with two apparently conflicting views concerning the dominant flow vectors in the most contaminated zone at the Site.

We, therefore, request that the Respondents immediately clarify their position concerning the hydrology in the shallow aquifer at the Site (including in that response, your contractor's quantified estimates of the average influent and effluent flow rates across every boundary of the shallow zone at the Site). This response must be in writing and must include the specific technical rationale and supporting data for the Respondents' position on this matter.

If we receive no response to this request, we shall assume that the Respondents have not reached any technically justifiable conclusions concerning the groundwater hydrology in the shallow aquifer at the Site.

Please contact me at (212) 264-3297 if there are any questions concerning this matter. We await your reply, including the technical documentation and the rationale supporting the Respondents' position on this matter.

Sincerely,

James P. Rooney
James P. Rooney
Office of Regional Counsel

cc: H. Gilbert Weil (Union Carbide Corp.)
Janet Feldstein (EPA-ERRD)
Pamela Lange (NJDEP)

Encl.

QR
4/24/89

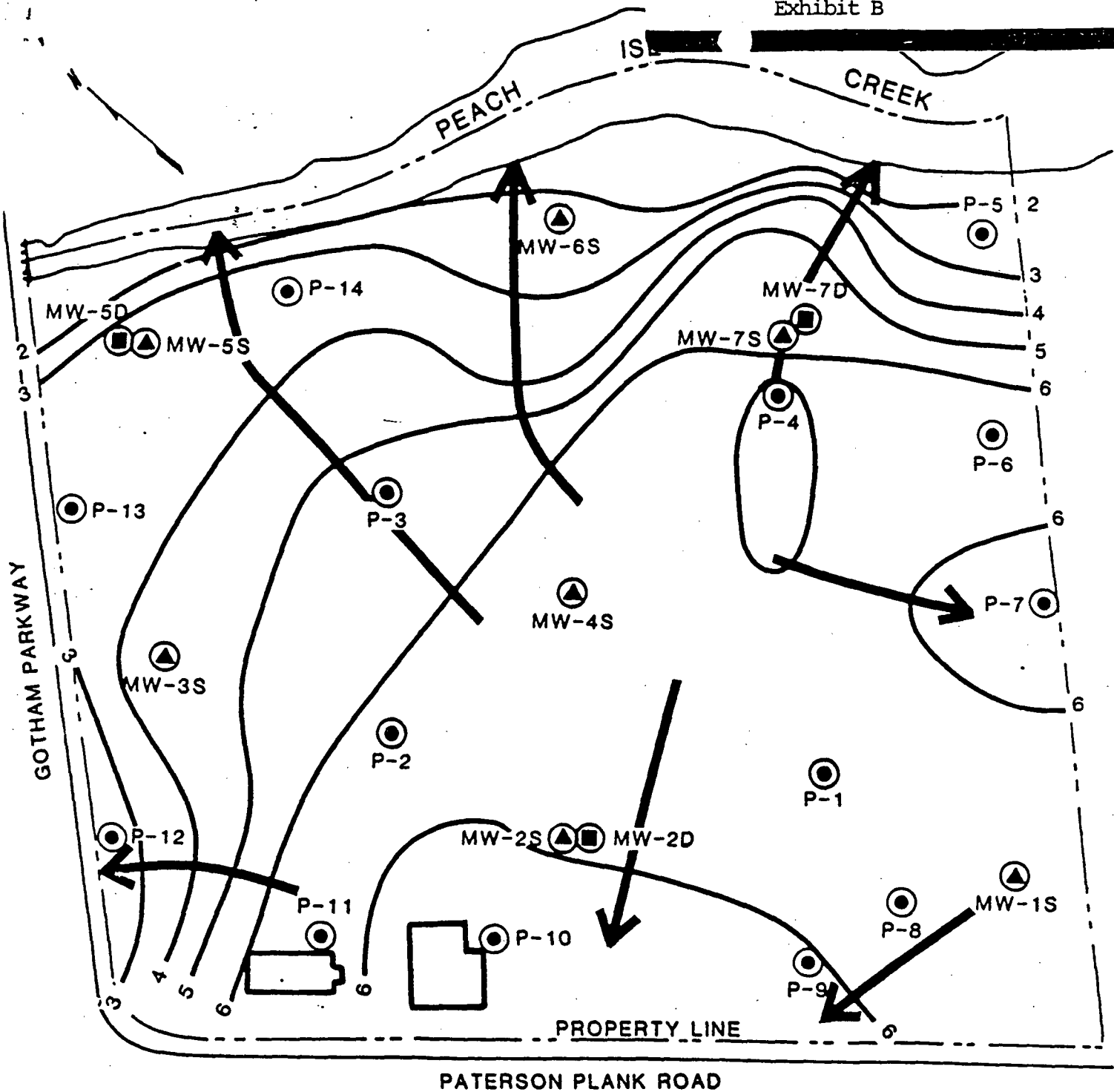
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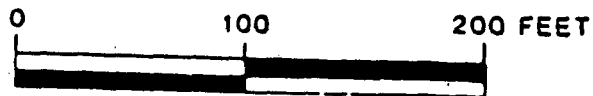
SCP-Carlstadt

<u>Name</u>	<u>Representing</u>	<u>Phone</u>
Janet Feldstein	EPA	(212) 264-0613
Pam Lange	NJDEP	(609) 633 1455
Harry Yeh	EBASCO	(201) 460-6502
Salvador A. Riggi Jr.	EBASCO	(201) 460-6312
NEIL A. KAYE	GAF CHEMICALS SCP-CARLSTADT	201-628-3770
JOE Chikowski	AT&T	201-771-6623
T Toskos	DAMES & Moore	(201) 272 8300
SUSAN HOFFMAN	COHEN, SHAPIRO	609-895-6215
DIANE LEBER	Ciba-Geigy	(914) 448-3131 x259
Pete Skundin	EPA/MMD	201-321-6730
TIM ROONEY	EPA-ORC	(212) 264-3297
Linda Welkom	NJDEP	(609) 292-8427
Gerry Coscia	Dames & Moore	201-272-8300
H. GILBERT WEL	FACIL. COORDINATOR	201-563-5905
Paul A. Schuff	Union Carbide	201-563-5442
Don Suphan	Dames & Moore	201-272-8300

004250



**WATER TABLE ELEVATION
SHALLOW AQUIFER- MARCH 7, 1988
SCP SITE, CARLSTADT, N.J.**



KEY:

- SHALLOW PIEZOMETER
- ◼ SHALLOW MONITORING WELL
- ➔ DIRECTION OF GROUNDWATER FLOW

004251

DAMES & MOORE

● **SENDER:** Complete Items 1 and 2 when additional services are desired, and complete Items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery
†(Extra charge)† †(Extra charge)†

3. Article Addressed to:

William Warren, Esq.
Cohen, Shapiro, Polisher et. al.
Princeton Pike Corporate Center
997 Lenox Drive - Bldg. No. 3
Lawrencville, New Jersey 08648

4. Article Number

P-545 546 097

Type of Service:

- ☒ Registered ☐ Insured
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☐ Express Mail

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or agent and DATE DELIVERED.

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6. Signature — Agent

X

7. Date of Delivery

8. Addressee's Address (ONLY if
requested and fee paid)

004252